

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano

v.

The City of Nashua, et al.

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Civil Action No. 22-cv-00326-LM

JOINT MOTION TO EXTEND DISCOVERY AND MOTION DEADLINES ONLY

NOW COME the parties in the above-captioned matter and seek to extend the discovery deadline from April 12, 2024, to May 15, 2024, for the purposes of taking depositions only and the summary judgment motion filing deadline from May 15 to May 31, 2024. In support hereof, the Parties state as follows:

1. This matter involves claims by Plaintiff that various Defendants violated her First Amendment rights, violated RSA 91-A, and/or defamed her.¹

2. Under the current Discovery Order and Trial notices, discovery is to be completed by April 12, 2024, Motions for Summary Judgment are due by May 15, 2024, and trial is scheduled for the period beginning October 16, 2024.

3. Although the parties have completed or are completing written/paper discovery, scheduling depositions with five different counsel before the April 12, 2024, discovery deadline has proven more complicated. Defendants are seeking the Plaintiff's deposition, and Plaintiff seeks the depositions of each of the named defendants and the Mayor of Nashua.

4. The parties have mapped out a deposition schedule the would complete these

¹ Additional claims were dismissed either by the Court on motion or by Plaintiff by stipulation thereafter

depositions by May15, 2024. Doing so, however, would require moving the summary judgment deadline out by approximately two weeks, to May 31, 2024.

5. Fortunately, the Court and Parties built some time into the schedule to accommodate such an event.

6. In particular, the summary judgment deadline is currently over 150 days before trial, and the issues are narrower than when first proposed. Thus, the parties believe the requested extensions will not require any continuance of the trial date and, indeed, will still provide over 135 days between the filing of dispositive motions and trial.

7. All parties assent to/join in this motion and each client has been advised of same.

WHEREFORE, the Parties request that this Court:

A. Grant this Motion and extend discover and motion dates as follows:

Deposition deadlines from April 12, 2024 to May 15, 2024

Summary Judgment Motions from May 15, 2024 to May 31, 2024; and

B. Grant such further relief as justice requires.

Respectfully submitted,

Date: April 5, 2024

Laurie Ortolano

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**City of Nashua, Michael Carignan, and
Frank Lombardi**

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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: April 5, 2024

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen